

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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| IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION | MDL No. 2875 HON. ROBERT B. KUGLER |
| THIS DOCUMENT RELATES TO: <i>Bambi Ganim v. Hetero Labs, Ltd., et al., No. 1:20-cv-07523</i> | |

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 – document 632), Plaintiff Bambi Ganim will take the deposition upon oral examination of Alpesh Shah, M.D., on **October 12, 2021 at 4:00 pm central time (5:00 pm eastern time)**, and continuing until completion, via remote deposition (Zoom) while the witness is at his home or office or other location agreed to by the parties. Please take further notice that: the deposition will be conducted remotely, using audiovisual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically via Zoom, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record

or interested in the events of this case. The court reporter and videographer will be an employee or agent of Golkow Global Litigation Services.

The attorney contact for the deposition is:

David Stanoch
Kanner & Whiteley, L.L.C.
701 Camp Street
New Orleans, LA 70130

The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

October 4, 2021

By:

/s/ David J. Stanoch
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| THIS DOCUMENT RELATES TO ALL CASES | |

CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By:

/s/ David J. Stanoch
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